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Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Petition of U.S. West )  
Communications, Inc. for Forbearance )  
Regarding the Provision of National ) CC Docket No. 97-172  
Directory Assistance. )

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**REPLY COMMENTS  
OF  
SBC COMMUNICATIONS INC.**

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SBC COMMUNICATIONS INC. ON BEHALF  
OF ITSELF AND ITS SUBSIDIARIES

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April 23, 1998

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## SUMMARY

Despite the Comments of AT&T and MCI to the contrary, U.S. West's NDA offering is an intraLATA service. AT&T and MCI's reliance upon 800 service as support for their position that NDA is an interLATA service is misplaced. The MFJ Court decision cited for this proposition concerned the divestiture related assignment of AT&T's assets and does not deal directly with the provision of national directory assistance by the BOCs. Moreover, 800 directory assistance service is clearly distinguishable from U.S. West's NDA offering.

If NDA is interLATA in nature, it is an incidental interLATA service under either Section 271(g)(4) or 271(g)(6) of the Telecommunications Act. AT&T and MCI's contentions that the difference between the BellSouth reverse directory service and NDA preclude a finding of NDA as an incidental interLATA service are overly restrictive. The basic similarities shared by the two services, i.e., the provisioning of directory assistance to local customers utilizing an information storage facility located outside LATA boundaries, is of greater relevance than the minor distinctions cited. The parameters of Section 271(g)(4) clearly encompasses the information retrieval involved in NDA.

Given that NDA is an incidental interLATA service, forbearance is in the public interest. The offering of NDA pursuant to the "411" dialing code is not anticompetitive. The issues raised by AT&T and MCI as to alleged violations of Commission Orders should be handled through complaint procedures. The "punishment" of U.S. West by the withholding of forbearance is inappropriate. The U.S. West NDA meets the three factors required for forbearance under Section 10.

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SBC COMMUNICATIONS INC.**

SBC Communications Inc, on behalf of itself and its subsidiaries (collectively referred to as "SBC") files these Reply Comments in response to comments submitted in accordance with the Public Notice issued on March 19, 1998 in the above-captioned docket.<sup>1</sup> SBC continues to assert that U.S. West's National Directory Assistance ("NDA") is an intraLATA service.<sup>2</sup> The fact that the service as provided by US West may involve the accessing of an additional database outside the customer's LATA and entails the provisioning a telephone number to a customer for a person or entity located outside the customer's LATA does not render NDA an interLATA service. However, even if the Commission were to adopt the arguments of AT&T and MCI that US West's service is interLATA, it is clearly an incidental interLATA service within the parameters of either Section 271 (g)(4) or 271(g)(5) and forbearance is warranted.

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<sup>1</sup> Comments in this proceeding were filed by AT&T ("AT&T Comments"); MCI ("MCI Comments"); Ameritech ("Ameritech Comments") and SBC ("SBC Comments").

<sup>2</sup> SBC intends to begin providing its own form of national directory assistance in the summer of 1998. While it believes this service is intraLATA in nature, SBC will shortly be filing its own Petition for Forbearance.

## **I. NDA IS NOT AN INTERLATA SERVICE.**

As US West and other commenters to this proceeding<sup>3</sup> have made clear, NDA is not an interLATA service. A database outside of the customer's LATA may be accessed and a telephone number conveyed to the customer that enables the customer to make an interLATA call, if he so chooses, utilizing the IXC of his choice. But given the definition of "interLATA service" specified by the Telecommunications Act,<sup>4</sup> such factors do not convert NDA into an interLATA service. Although MCI in its Comments would seek to expand this definition through a series of inferences,<sup>5</sup> this provision of the Act is clear and unequivocal. Nor does BellSouth's alleged offering of call completion as part of its national directory assistance relate to U.S. West's NDA which entails simply the provisioning of information.<sup>6</sup> Embellishments to further a specious argument do not change the facts.

In addition, both MCI and AT&T take the position that since the MFJ Court, before the passage of the Telecommunications Act, deemed 800 directory assistance to be an interLATA service, there is no flexibility that would allow the Commission to find NDA is an intraLATA service.<sup>7</sup> To place this judicial decision<sup>8</sup> in its proper context, the matter before the Court was whether to approve AT&T's plan of reorganization. The one

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<sup>3</sup> Ameritech Comments, p. 1-2; SBC Comments, pp. 2-5.

<sup>4</sup> 47 U.S.C. 153 (21).

<sup>5</sup> MCI Comments, pp. 9-12.

<sup>6</sup> MCI Comments, p. 12.

<sup>7</sup> MCI Comments, p. 14; AT&T Comments, pp. 3-4.

<sup>8</sup> United States v. Western Electric Co., 569 F. Supp. 1057, 1102 (D.D.Ct.1983).

brief conclusory paragraph mentioning 800 service, as part of a 74 page decision, concerned only the assignment of network facilities associated with the 800 service. Under the terms of its plan of reorganization, AT&T proposed to allocate its facilities, personnel and equipment on the basis of predominant use, i.e. based upon whether the facilities involved were used by AT&T predominantly for the provisioning of interexchange or local exchange service. AT&T represented to the court that 800 directory assistance facilities were used predominantly in connection with interexchange service. The BOCs, of course, since they were then owned by AT&T, had no opportunity to make their views known. And not surprisingly, or unreasonably given pre-divestiture circumstances, the Court allowed AT&T to retain these facilities as it requested. The issue of whether the BOCs, in addition to AT&T, could be allowed to provide 800 directory assistance service was not directly before the Court.

A more analogous ruling concerns the MFJ Court's granting of U.S. West's request to provide directory assistance on behalf of independent telephone companies. In considering whether US West could be permitted to provide directory assistance across LATA boundaries, the Court stated:

AT&T is currently providing (and other exchange carriers can similarly provide) interLATA directory assistance by using directory information provided by U.S. West pursuant to its access tariffs. Thus, callers who are not only outside the NPA (and LATAs) but also outside the States served by US West would presumably not be inconvenienced if directory assistance is provided over the facilities of an interexchange carrier rather than those of the US West Operating Companies. **However, if US West can show that this assumption is incorrect, its request can still be granted.<sup>9</sup>**

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<sup>9</sup> Memorandum Order, United States v. Western Electric Company, Civil Action No. 82-1092, pp. 4-5 (D.D.C. October 30, 1994).

Significant changes have taken place since this decision was published in October 1984. Provision of national directory assistance exclusively by IXC's, in the manner in which they have chosen to provide it, clearly has inconvenienced the public in this world of evolving area code splits. The benefit offered to consumers by allowing the BOC's to enter this market is of the nature envisioned by the MFJ Court.<sup>10</sup>

Moreover, NDA is clearly distinguishable from AT&T's 800 service. Under AT&T's 800 service, a "Responsible Organization" obtains an 800 telephone number from AT&T for its use. These numbers are maintained in an AT&T database and are made available to 800 directory assistance callers when the callers dial 1-800-555-1212. AT&T charges the Responsible Organization monthly recurring and nonrecurring charges for the provisioning and maintenance of the 800 service records. The caller is not billed any charges for either 800 directory assistance or the placing of an 800 call. All 800 calls are routed exclusively to AT&T which continues to have a monopoly in the provisioning of this service and the directory assistance service associated with it. This monopoly status remains a concern of the Commission.<sup>11</sup> In contrast, the NDA service provided by U.S. West merely makes it a player in an already competitive market.<sup>12</sup> Various carriers currently use the NPA 555-1212 dialing pattern which shall remain in effect. While 800

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<sup>10</sup> MCI's assertion that national directory assistance was not a previously authorized service under the MFJ is carefully phrased. (MCI Comments, pp. 13-14). The BOC's have pre-divestiture and post-divestiture included foreign listings, at the request of the foreign entities, in BOC white page directories and provided these listings to callers as part of local directory assistance.

<sup>11</sup> In the Matter of Provision of Access for 800 Service, Report and Order, 4FCC Rcd 2824 (1989).

<sup>12</sup> MCI Comments, p. 18.

directory assistance is a monopoly service offered by a single carrier in conjunction with its transmission of interLATA 800 calls, national directory assistance is a fully competitive service currently offered by multiple parties. Unlike 800 directory assistance, it is not inextricably tied to the transmission of interLATA calls by a particular carrier. U.S. West, through its provisioning of NDA, is simply providing information which enables a caller, if he so chooses, to place a call over an interexchange carrier's facilities.

The provisioning of numbers outside a LATA cannot be categorized as an interLATA service without applying the same rationale to AT&T's provisioning of local numbers through its "00-Info" directory assistance service and its 800 directory assistance service. If a BOC is engaged in offering an interLATA service simply because it gives a customer a telephone number outside his LATA, then AT&T is engaged in providing local residential and business service across the country when it provides a caller a local number for an entity located inside the customer's LATA.

Obviously, the arguments of MCI and AT&T fall apart upon closer analysis. The MFJ Court's decision regarding the allocation of 800 service assets is not dispositive of the issue of whether national directory assistance is an interLATA service. Rather, a later decision by Judge Greene would indicate that he was open to allowing the BOCs to provide directory assistance service across LATA boundaries. Moreover, 800 directory assistance is clearly distinguishable from U.S. West's NDA offering. These attempts to cloud the record with inapplicable analogies does not alter the appropriate characterization of NDA as an intraLATA service under the provisions of the Telecommunications Act.

**II. EVEN IF THE COMMISSION WERE TO ACCEPT THE ARGUMENTS OF MCI AND AT&T THAT U.S. WEST'S NDA IS AN INTERLATA SERVICE, NDA IS CLEARLY WITHIN THE SCOPE OF SECTION 271 (g) AS AN INCIDENTAL INTERLATA SERVICE.**

Neither AT&T nor MCI cite any precedent or relevant language in the Act for their arguments that NDA does not constitute an incidental interLATA service as defined in Section 271(g) of the Act. Indeed, although these parties scoff at U.S. West's citation of the Act, they have still less to offer in support of their positions, choosing instead to distort the clear meaning of the Act's definition. In arguing that NDA is not an incidental interLATA service, both contend that the Commission's recent Forbearance Order in relation to Bell South's reverse directory service<sup>13</sup> cannot be relied upon in this proceeding because the U.S. West offering is a different directory assistance service.<sup>14</sup> Needless to say, the distinctions drawn by these entities as the basis for denying any analogy are completely dissimilar. AT&T believes that the fact that the number provided by U.S. West is outside the LATA of the customer is alone grounds for denying this precedent.<sup>15</sup> MCI, on the other hand, argues that it is the fact that the Bell South service involves an electronic information retrieval system without live operator intervention that is determinative.<sup>16</sup> MCI and AT&T seemingly would have the Commission hold that a "narrow construction" of Section 271(g) requires that only a service identical to that

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<sup>13</sup> Petitions for Forbearance From the Application of Section 272 of the Communications Act of 1934, As Amended, to Certain Activities, Memorandum Opinion and Order, CC Docket No. 96-149, DA 98-220, released February 6, 1998 ("Forbearance Order").

<sup>14</sup> AT&T Comments, p. 10; MCI Comments, pp. 16-17.

<sup>15</sup> AT&T Comments, p. 10.

<sup>16</sup> MCI Comments, pp. 16-17.

offered by Bell South pursuant to the Forbearance Order can be classified as an incidental interLATA service.

The Forbearance Order was cited as precedent for the exercise of the Commission's forbearance in the instant matter, given the similarity of the services, not to infer that NDA is an identical offering. In both situations, the BOC offering falls within the definition of an incidental interLATA service, thus allowing the Commission to forbear from imposing separate affiliate requirements. The factors cited by MCI and AT&T do not alter the nature of the service; both offerings involve directory assistance for local customers. The similarities between the two services with respect to the Act's definition of incidental interLATA service are far greater than the two distinctions made by competitors seeking to protect their market shares.

Despite AT&T's assertions to the contrary,<sup>17</sup> NDA is incidental to U.S. West's provisioning of exchange access service. Directory assistance is a service long provided by the BOCs. NDA is little more than the provisioning of additional listings via the same resources and in essentially the same manner. If the customer chooses to place the call upon receiving the NDA number, the interLATA call will be placed with an IXC and handled as part of U.S. West's exchange access obligation. Therefore, even the requirement that AT&T would impose for an incidental interLATA service, i.e. that it must relate to an intraLATA service being provided by the BOC, is met.<sup>18</sup> There is no reason to assume that a ruling by the Commission that NDA constitutes an incidental interLATA service would open the floodgates envisioned by AT&T. Should a BOC seek

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<sup>17</sup> AT&T Comments, p. 2.

<sup>18</sup> AT&T Comments, p. 10.

to offer an incidental interLATA service without the prohibitive expense of establishing a separate affiliate, it would need to file for forbearance from the Commission, at which time the advisability of allowing the BOC to provide the service and the proper categorization of the service would be analyzed. AT&T's specter of BOCs wildly providing "interLATA services without limitation in order to provide data storage or retrieval functions"<sup>19</sup> is unfounded.

Similarly, MCI's argument that Section 271(g)(4) is inapplicable to NDA because a live operator is involved in accessing the stored database listings incorrectly emphasizes form over substance. The operator is acting on behalf of the customer at the customer's behest. As the Commission has recognized, computer-provided directory assistance by its nature involves customer, or in this case operator, interaction.<sup>20</sup> To state that NDA is not an incidental interLATA service under Section 271(g)(4) because a customer is not retrieving stored information by purely electronic means adds a totally fabricated requirement to the definition.

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<sup>19</sup> AT&T Comments, p. 11.

<sup>20</sup> See, In the Matter of North American Telecommunications Association: Petition for Declaratory Ruling Under Section 64.702 of the Commissions Rules Regarding the Integration of Centrex, Enhanced Services and Customer Premises Equipment, Memorandum Opinion and Order, 101 FCC 2d 349, 360 (1985) ("Computer provided directory assistance involves the provision to the customer of additional, different or restructured information and involves some subscriber interaction with stored information. . .") See also, In the Matter of Implementation of the Telecommunications Act of 1996; Telecommunications Carriers Use of Customer Proprietary Network Information and Other Customer Information, CC Docket No. 96-115, and In the Matter of Implementation of the Non-Accounting Safeguards of Section 271 and 272 of the Communications Act of 1934, as Amended, CC Docket No. 96-149, Second Report and Order and Further Notice of Proposed Rulemaking (Released February 26, 1998), Paragraph 78 ("When a customer uses directory assistance the customer accesses information stored in a telephone company database.")

As the Commission has recognized,<sup>21</sup> times have changed since that date fifteen years ago when Judge Greene assigned AT&T the 800 directory assistance assets. The Telecommunications Act now permits the BOCs to engage in incidental interLATA services, a category unrecognized prior to the passage of the Act. In its Comments in this proceeding,<sup>22</sup> SBC discussed how NDA as offered by U.S. West could be properly categorized under either Section 271(g) (5) or Section 271(g)(4) as an incidental interLATA service. The arguments offered by MCI and AT&T do little more than seek to confuse a clearly defined conclusion.

**III. THE COMMISSION HAS THE AUTHORITY TO FORBEAR, AND SHOULD FORBEAR, FROM IMPOSING SEPARATE AFFILIATE REQUIREMENTS IF IT DEEMS NDA TO BE AN INCIDENTAL INTERLATA SERVICE.**

AT&T<sup>23</sup> and MCI<sup>24</sup> claim that the Commission does not have the authority to forbear the imposition of separate affiliate requirements on the basis that NDA constitutes an interLATA service which can only be offered once U.S. West obtains "in-region interLATA authority."<sup>25</sup> How U.S. West could logistically comply with Section 271(d)(3) in its provision of NDA is never fully explained nor discussed. As described

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<sup>21</sup> See, e.g., In the Matter of Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934 as amended, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 21905 (1996), Paragraph 122, Footnote 280.

<sup>22</sup> SBC Comments, pp. 5-7.

<sup>23</sup> AT&T Comments, p. 12.

<sup>24</sup> MCI Comments, p. 18, footnote 44.

<sup>25</sup> AT&T Comments, pp. 12.

above, and as AT&T acknowledged in its Comments<sup>26</sup> the provisioning of a telephone number for an entity located outside a customer's LATA is not so intertwined with the transmission of an interLATA call that one must necessitate the other. To argue on the basis of this record that the Commission does not have the authority to grant forbearance is disingenuous.

More to the point are the arguments made by AT&T and MCI as to why the Commission should not forbear from imposing separate affiliate requirements on U.S. West in its offering of NDA.<sup>27</sup> As SBC discussed in its Comments,<sup>28</sup> the issue of forbearance only arises if the Commission finds U.S. West's NDA service to be an incidental interLATA service under Section 271(g)(4). If the Commission finds that U.S. West's NDA involves interLATA signaling as contemplated by Section 271(g)(5), then forbearance is immaterial because a separate affiliate is not mandated.<sup>29</sup>

While both AT&T and MCI take the position that the first prong of the forbearance test specified in Section 10 of the Act has not been met, only AT&T goes on to argue that the U.S. West offering fails to satisfy the remaining two standards. The first test is that enforcement of the separate affiliate requirements is not necessary to ensure "that the charges, practices, classifications, or regulations by, for or in connection with that telecommunications carrier or telecommunications service are just and reasonable and are not unjustly or unreasonably discriminatory." AT&T claims that U.S. West is

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<sup>26</sup> AT&T Comments, p. 2.

<sup>27</sup> AT&T Comments, pp. 12-20; MCI Comments, pp. 17-24.

<sup>28</sup> SBC Comments, pp. 6-7.

<sup>29</sup> SBC Comments, pp.5-6.

engaging in discriminatory practices by denying access to the "411" dialing code to IXCs who are not local exchange providers.<sup>30</sup> MCI asserts that the refusal of U.S. West to provide it with access to the national directory information contained in a vendor's database also constitutes discriminatory treatment.<sup>31</sup>

These issues concern legal interpretations of previously issued Commission Orders<sup>32</sup> in other dockets outside of the instant proceeding. As such, the Commission's complaint procedure is a more appropriate means of resolving these disparate positions. To "punish" U.S. West by denying forbearance without any investigation or finding that its activities violated the Commission's dictates is unreasonable and violates due process.

SBC would note that U.S. West's denial of the "411" code to IXCs appears valid. The "411" code is recognized as a local dialing code utilized for the provisioning of local directory assistance. The IXCs have access and will continue to have access to the 555-1212 dialing pattern in providing directory assistance. In order for an IXC who is not a local exchange provider to be permitted to use "411" solely for the provisioning of national directory assistance, seemingly would necessitate a customer's pre-subscription of a directory assistance provider, in addition to a local service provider and IXC. This interpretation does not appear to have been contemplated by the Commission in any of its previous orders.

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<sup>30</sup> AT&T Comments, pp. 13-17.

<sup>31</sup> MCI Comments, pp. 18-24.

<sup>32</sup> See, Second Report and Order and Memorandum Opinion and Order, Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, FCC 96-333 (released August 8, 1996), and First Report and Order and Further Notice of Proposed Rulemaking, The Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, FCC 97-51, (released February 19, 1997).

MCI complains that U.S. West has not provided it with access to all listings to which MCI has access and has denied it access to national directory assistance as an unbundled network element.<sup>33</sup> This argument is irrelevant in determining forbearance since there is no evidence that the situation would be any different if U.S. West provided NDA through a separate affiliate. Moreover, in making its complaint, MCI discounts the fact that the listings in question are not the property of US West; US West receives access to these listing either through a license agreement or other arrangement with the vendor which compiles and maintains the national listing database and/or an ILEC with local listing information. In either case, MCI can obtain and has obtained this information from other sources. U.S. West is likely to be foreclosed by legal agreement from licensing this information to MCI without the authorization of the wholesale listing supplier. US West and other BOCs should have no increased obligation to provide access to listing information they do not possess in the normal course of providing local exchange service. To require a BOC to provide access to listing information it does not own would jeopardize the BOC's relationship with the wholesale listing supplier and thereby put at risk the BOC's ability to offer national directory assistance service. Since MCI can obtain this information directly from a wholesale listing provider or an alternative directory assistance provider, as AT&T has done for its "00-Info" and NPA 555-1212 directory assistance, there is no compelling need which offsets this detrimental effect.

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<sup>33</sup> MCI Comments, pp. 22-24.

Nor are the arguments of MCI persuasive with regard to the "anticompetitive" advantage of "411" access code.<sup>34</sup> U.S. West and any other BOC that seeks to provide national directory assistance will begin with a zero market share. The consumer has long been used to dialing the relevant area code in order to obtain national directory assistance. These dialing patterns were established over decades and will not change overnight. Consumers can also use AT&T's existing "00-Info" service and 1-800-CALL-ATT to obtain national and local directory service. The key as to which competitor the customer chooses to use will depend upon the offering and the price of that offering, not the dialing pattern. As dial-around interexchange providers have demonstrated, it is the product, not simply expediency, that is of value to the customer. While dialing "411" to obtain a national directory listing will be of convenience to the customer, it does not provide an anticompetitive advantage to a BOC or CLEC.

With regard to the second factor of the Section 10 test, it is difficult for AT&T to maintain that U.S. West's offering of NDA on an integrated basis is not in the interest of the consumer. AT&T simply states that if structural separations was not in the interest of the consumer, Congress would not have enacted Section 272.<sup>35</sup> Even if these carriers do not as CLECs obtain the "411" dialing pattern for national directory assistance, consumers have grown used to dialing the applicable area code to obtain a telephone number outside their LATA. If this service is competitively priced and packaged to meet consumer needs, there is no reason to assume that a consumer will change his current

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<sup>34</sup> MCI Comments, pp. 18-19.

<sup>35</sup> AT&T Comments, pp. 18-19.

dialing practices. If he does, it will be because U.S. West's offer better meets the consumer's needs. In other words, as in all competitive markets, the consumer benefits from a greater number of alternatives. If U.S. West ceases to offer this service because separate affiliate requirements are imposed, the consumer will suffer.

The third and final point is whether structural separations is necessary to protect the public interest and promote competition. AT&T appears to take umbrage at the inference that it would not have offered its "00-Info" service but for the U.S. West entry into the national directory assistance market.<sup>36</sup> However, even if the Commission were to accept that AT&T implemented this service prior to the initiation of NDA, this fact in no way supports the contention that a separate affiliate is necessary to promote competition and is in the public interest. The magnitude of the response received by U.S. West supports the contrary conclusion. AT&T's directory assistance charges continue to increase in the current national directory assistance market. To the extent that this restriction would result in U.S. West's elimination of its NDA offering and discourage other BOCs from entering the market, it is clearly not in the interests of further competition.

#### **IV. CONCLUSION**

As discussed by SBC in its Comments to this proceeding, U.S. West's offering of NDA constitutes an allowable intraLATA service. Should the Commission find that the service is an interLATA service, it is an incidental interLATA service under either Section 271(g)(4) or (g)(5). If found to be an incidental interLATA service under Section

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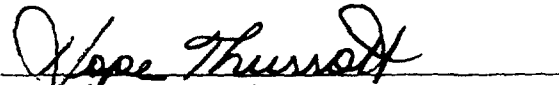
<sup>36</sup> AT&T Comments, pp. 19-20.

271(g)(4), forbearance is clearly warranted and appropriate. The arguments of MCI and AT&T should be considered from their vantage points as the dominant providers of national directory service and rejected.

Respectfully Submitted,

SBC COMMUNICATIONS INC. ON BEHALF OF  
ITSELF AND ITS SUBSIDIARIES

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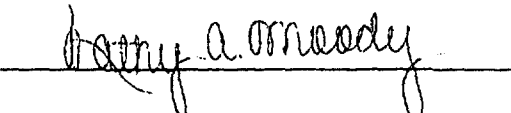
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April 23, 1998

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I, Kathy A. Moody, hereby certify that "Reply Comments of SBC Communications, Inc." in CC Docket No. 97-172 have been served on April 23, 1998, to the Parties of Record.

  
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April 23, 1998

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